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Co-Lead Counsel for Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

This Document Relates to:
ALL CASES

**ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
FILED UNDER SEAL**

TO THE COURT, THE PARTIES, AND ALL COUNSEL OF RECORD:

Under Civil Local Rules 7-11 and 79-5(f), Plaintiffs hereby move the Court to consider whether certain materials should be sealed. Plaintiffs file these materials under seal because they have been produced and marked confidential or contain references to documents produced and marked confidential by Uber.

Material To Be Filed Under Seal

The materials to be filed under seal are portions of the Parties' Discovery Letter Brief Regarding the Orchowski Rebuttal Report and exhibits attached thereto. Plaintiffs request the Court consider whether the following should be filed under seal:

Document	Description	Designating Party
Portions of the Parties' Discovery Letter Brief Regarding Orchowski Rebuttal Report	References to information deemed confidential by Defendants	Defendants
Exhibit A	Rebuttal Expert Report of Lindsay Orchowski, marked "Highly Confidential"	Defendants
Exhibit B	Exhibit 434 to deposition of Gus Fuldner, marked "Highly Confidential"	Defendants

Under Local Rule 79-5(f)(3), the Designating Party bears responsibility to establish that all of the designated material is sealable, and must “file a statement and/or declaration as described in subsection (c)(1)” of the Local Rules.

This motion complies with Civil Local Rule 7-11 and 79-5, and the following attachments accompany this motion:

1. The Declaration of Roopal P. Luhana in Support of this Motion; and
2. A Proposed Order that lists in tabular format all material sought to be sealed.

1 Dated: November 14, 2025

2 Respectfully submitted,
3 By: /s/ Roopal P. Luhana
4 Roopal P. Luhana
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